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Attorneys for National Notary Association

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TERESA TURNER,

Plaintiff,

v.

NATIONAL NOTARY
ASSOCIATION,

Defendant.

Case No. 2:25-cv-00334-FMO-PD

**DECLARATION OF ROBERT
CLARKE IN SUPPORT OF
MOTION TO DISMISS**

Judge: Fernando M. Olguin

Hearing Date: April 10, 2025

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1 I, Robert Clarke, declare as follows:

2 1. I am of sound mind, over the age of 18, and have authority to make this
3 declaration on behalf of the Defendant the National Notary Association (“NNA”).
4 The matters set forth in this declaration are based on my personal knowledge or my
5 personal investigation and review of relevant records.

6 2. My current title is Chief Financial Officer and Vice President of
7 Finance. In this role, my duties include overseeing the financial operations of the
8 NNA, guiding its financial strategy and planning, and maintaining its fiscal stability.
9 In this role, I collaborate with the executive management team to establish long-
10 range goals, strategies, plans, and policies. Other key responsibilities include
11 financial management, strategic planning, financial reporting, oversight of legal
12 matters, compliance, and risk management.

13 **Background About the National Notary Association**

14 3. The NNA is the preeminent professional association for the American
15 Notary, and the ultimate source for every notarial need.

16 4. As the foremost authority on the American Notary office, the NNA is
17 dedicated to imparting knowledge, understanding and unity among all notaries, and
18 instilling in them the highest ethical standards of conduct and sound notarial
19 practices.

20 5. The NNA is a national organization which provides commission and
21 renewal programs for notaries in all 50 states and the District of Columbia.

22 6. The NNA’s primary products and services include: public advocacy,
23 insurance and bond products, notary supplies, education and training programs, and
24 online databases.

25 7. Public Advocacy: A core mission of the NNA is notary advocacy. The
26 NNA engages on issues of importance to the notary community at both the state and
27 federal levels. As just one example, the NNA developed the Model Notary Act which
28 reflects best practices for how states should manage notary commissions. Over time,

1 the NNA has updated the Model Notary Act multiple times and, as a result, 30 to 40
2 states have adopted the Model Act in full or in part as a framework for their own
3 state notary regulations.

4 8. Insurance and Bond Products: A majority of jurisdictions require
5 notaries to carry either a notary bond or notary errors and omissions (E&O)
6 insurance. For example, California requires every notary to obtain a \$15,000 surety
7 bond. Even in states where insurance is not required, a notary bond or insurance
8 product will protect the notary against mistakes and false claims. The NNA sells
9 these insurance and bond products to our notary constituents.

10 9. Notary Supplies: The NNA sells a variety of products that aid notaries
11 in carrying out their official notarial duties. These products include, among others:
12 stamps, journals, certificates, thumb printers, handbooks, electronic notary products,
13 and security and privacy products. Some state laws require notaries to have these
14 products.

15 10. Education and Training Programs: The NNA provides training and
16 education programs to allow individuals to become a notary and renew their notary
17 commission specific to the state or jurisdiction in which they seek their commission.

- 18 a. The NNA training and education programs are available both online
19 and in live courses in California.
- 20 b. The NNA also offers an annual conference for notaries which
21 includes training components and deeper dives into notary training.
- 22 c. The NNA programs are designed to meet the legal requirements to
23 become a notary (or renew a commission for an existing notary).
24 Depending on the state and selected program, this may include
25 application forms, background checks, checklists, written materials,
26 and interactive learning content.



11. Professional Notary Directory: The NNA provides individuals certified through the Notary Signing Agent program with access to its online database, where clients can search for signing agents. The NNA also offers the “Find a Notary” service, which functions as an on-demand directory for notaries where potential clients can find, contact, and schedule appointments with them through the website.

The NNA’s Online Education Programs.

12. As set forth above, one of the several missions of the NNA is to educate and train notaries and serve as a resource to them.

13. To this end, the NNA offers its training and education programs online in all states and live in California, and through in-person and online conferences.

14. I understand that Plaintiff Teresa Turner (“Ms. Turner”) filed her complaint in this case on January 15, 2025. At the direction of my counsel, I have observed the NNA’s data related to Ms. Turner for the two years preceding the filing of this action (the “Relevant Time Period”).

15. First, I note that online education programs comprise of only 10% or less of the NNA’s total sales during the Relevant Time Period.

16. Next, my review of the NNA records revealed that during the Relevant Time Period, the only programs that Ms. Turner obtained from the NNA were the

NNA’s notary signing agent certification and continuing education training program, titled “NSA CE” and “NSA Online” (referred to as the “NSA Certification”). These programs make up approximately 1% of the NNA’s total sales during the Relevant Time Period.

The Website Does Not Collect or Disclose “Private Video Information”

17. Online education and training programs may be purchased from the NNA’s website (nationalnotary.org) (“Website”). However, as explained further below, the programs are hosted or delivered on an entirely separate third-party platform.

18. To purchase an online education program, a user must add their desired program to their shopping cart, and then complete the “Checkout Page:”

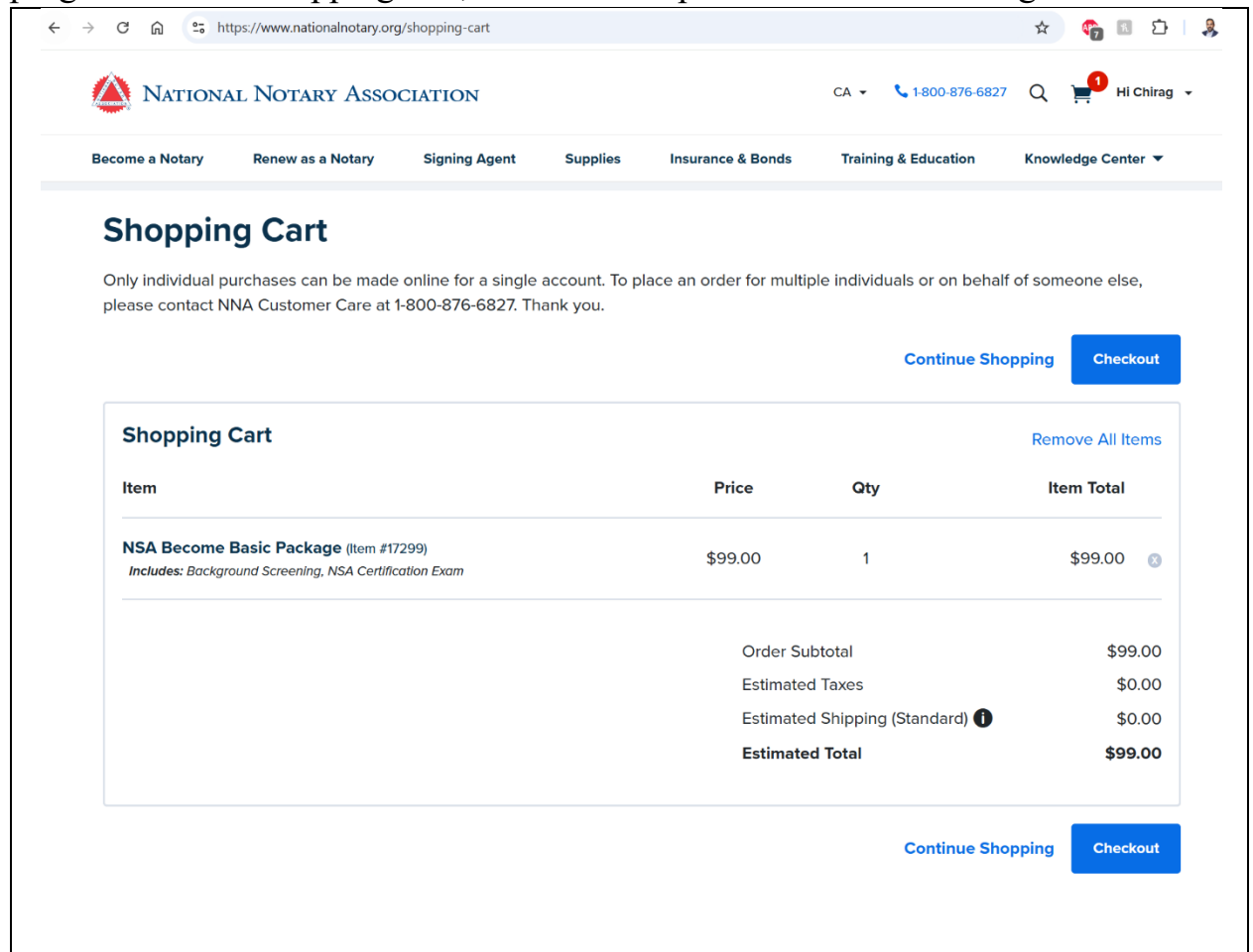


Figure 2, Sample Shopping Cart

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Figure 3, Sample Checkout Page

19. Although the Meta Pixel was implemented on the NNA's Website during the Relevant Period, the NNA was intentional in its implementation to limit the type of data Meta received and specifically configured the Pixel *not* to allow Meta to collect the names of the online education and training programs purchased on its Website. Specifically:

20. As to URLs of the Shopping Cart and Purchase Pages:

- a. When a visitor places a program in their shopping cart, the shopping cart has a generic URL (nationalnotary.org/shoppingcart). See **Figure 3**. Thus, Meta does not receive a URL containing the name of the program that the user intends to purchase.

b. When a visitor proceeds to the checkout page, that check out page also has a generic URL (nationalnotary.org/checkout). *See Figure 3.* Thus, Meta does not receive a URL containing the name of the program the user has purchased.

21. As to the Contents of Shopping Cart and Purchase Pages: Meta does not have access to the names of online education and training programs that are in a visitor's shopping cart or that are purchased by the visitor, because the data field for the "course_name" was a numeric field (Float) (i.e., a random set of numbers) rather than a text field (String) (i.e., as text that describes the course names), as demonstrated in *Figure 4*, below.

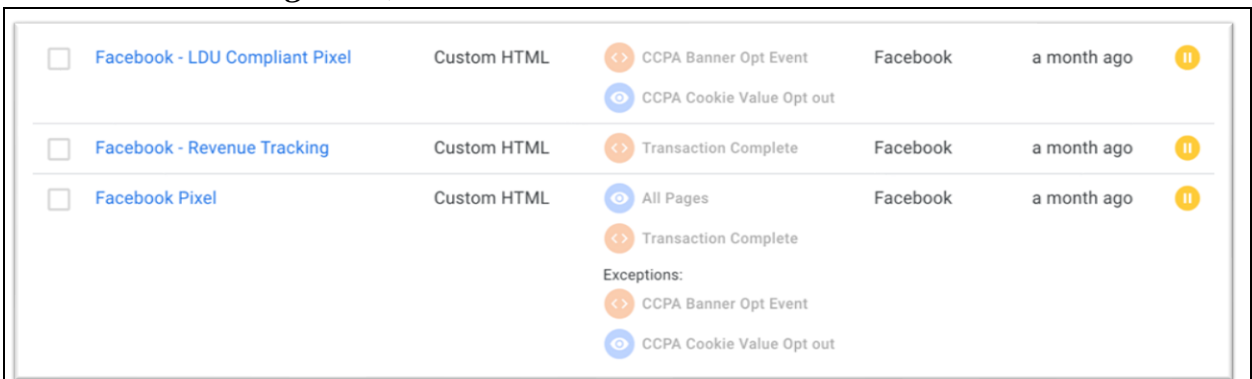


Figure 4, Screenshot of BigQuery Data Analysis of Shopping Cart/Purchases Pages

22. The Meta Pixel did not collect any other details unless explicitly configured to do so (which it was not during the Relevant Time Period).

23. In short, the Pixel was never deployed on a page or in a manner that would allow Meta to collect information related to a user's purchase of an educational program from the Website.

The Website Does Not Host the Online Education and Training Programs

24. As mentioned, the NNA Website does not host or deliver the educational and training programs that are available on the NNA Website.

25. Rather, those programs are hosted by an independent third-party

platform called “Crowd Wisdom.”

26. After obtaining an online education or training program on the Website, the user accesses the Online Training program through a link:

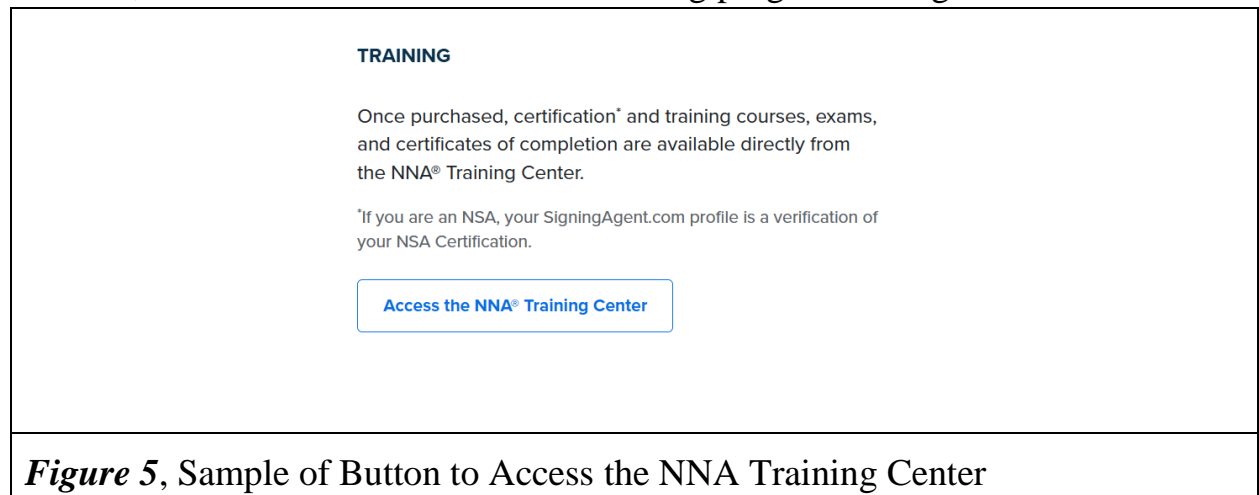


Figure 5, Sample of Button to Access the NNA Training Center

27. When the user clicks the link, they are redirected to Crowd Wisdom’s website (mycrowdwisdom.com).

28. The first-time a user clicks a link to access content on Crowd Wisdom’s website, the Crowd Wisdom’s Privacy Policy pops-up on the screen:

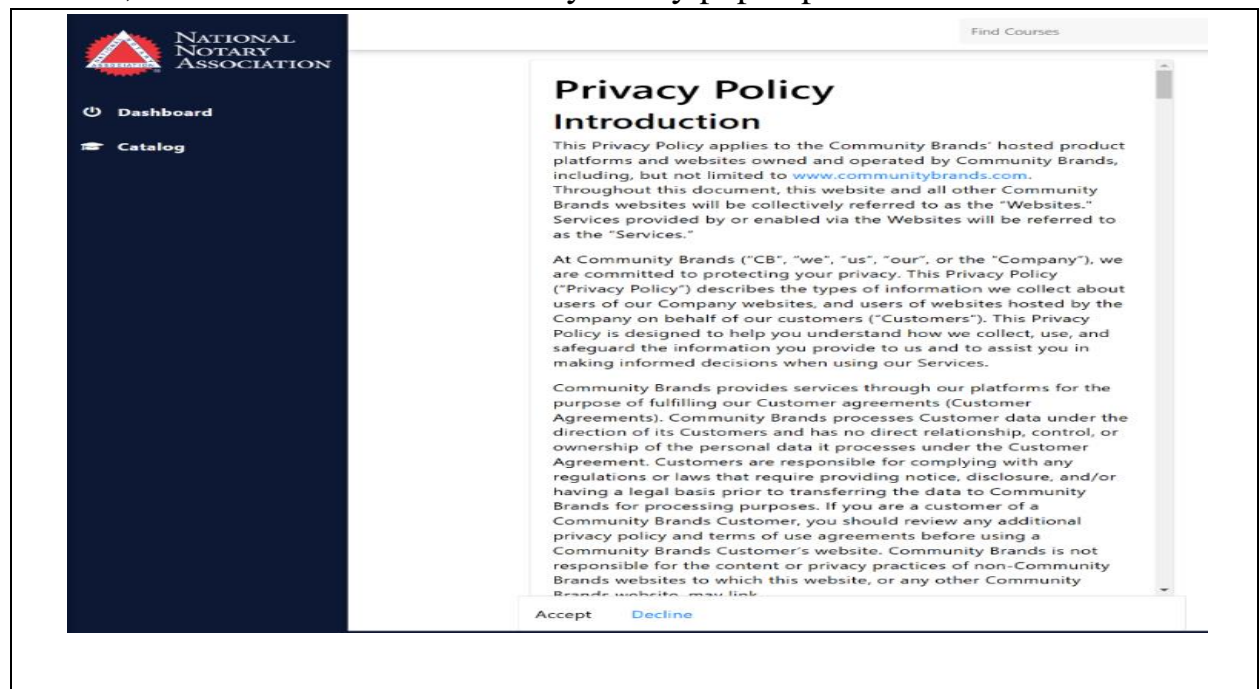


Figure 6, CrowdWisdom Consent Page

29. As indicated in **Figure 6**, above, a user cannot access the Crowd

1 Wisdom platform unless they affirmatively click “Accept.”

2 30. Once on Crowd Wisdom’s website, the user can then access the
3 education programs they purchased from the NNA.

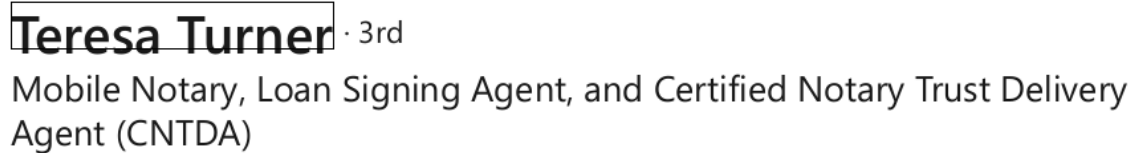
4 31. The Meta Pixel is not deployed on the Crowd Wisdom Platform at all.

5 **Further Investigation into Ms. Turner**

6 32. As part of my investigation into Ms. Turner, and at the direction of my
7 Counsel, I also conducted research into Ms. Turner’s public presence on the internet
8 and social media websites.

9 33. My investigation revealed Ms. Turner’s LinkedIn Profile. A true and
10 accurate copy of her profile as of March 3, 2025 is attached as **Exhibit 1**.

11 34. Ms. Turner lists her professional title as: “Mobile Notary, **Loan**
12 **Signing Agent**, and Certified Notary Trust Delivery Agent (CNTDA)”:

13 A screenshot of a LinkedIn profile header for Teresa Turner. The name 'Teresa Turner' is in a large, bold, black font, followed by a small blue icon and the text '· 3rd'. Below the name, the professional title 'Mobile Notary, Loan Signing Agent, and Certified Notary Trust Delivery Agent (CNTDA)' is written in a smaller, black font. There is a small blue and orange icon to the left of the title.

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17 ***Figure 7***, Snapshot of Ms. Turner’s Public LinkedIn Page (Header) (Ex. 1 at 1
18 (emphasis added))

19 35. Ms. Turner also publicly lists the NNA as one of her “interests”:
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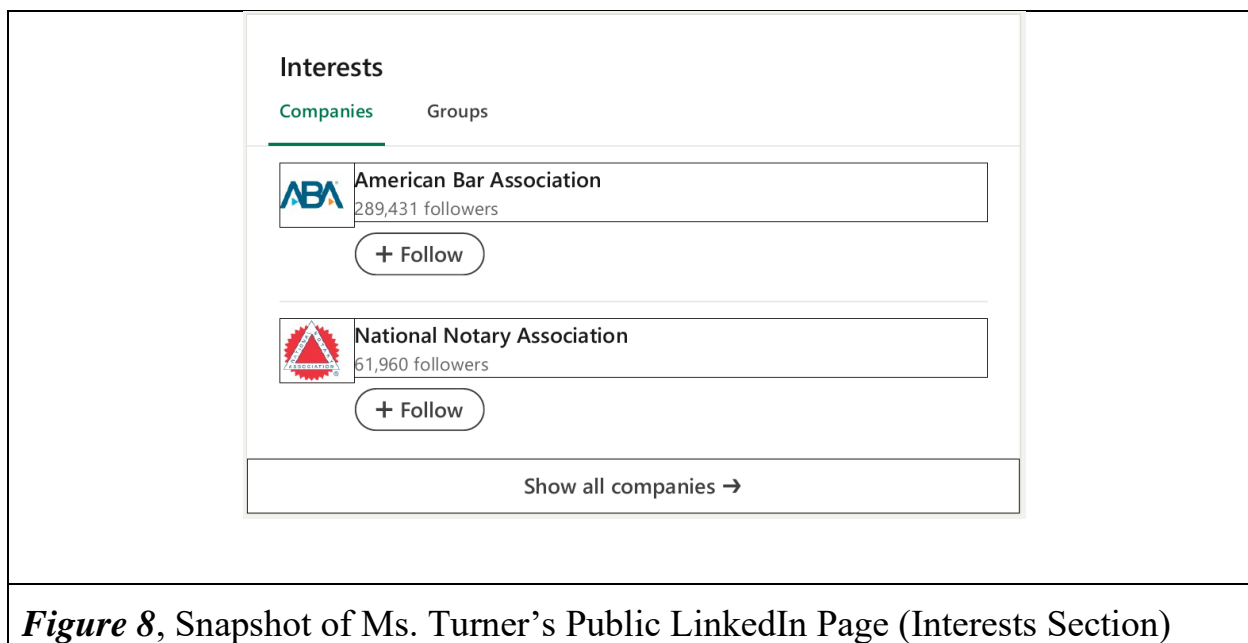


Figure 8, Snapshot of Ms. Turner’s Public LinkedIn Page (Interests Section)

36. A true and accurate copy of the “Licenses & Certifications [sic]” section of Ms. Turner’s LinkedIn Page as of March 3, 2025 is attached as Exhibit 2.

37. Under her “Licenses and Certifications,” Ms. Turner publicly lists “Loan Signing Agent, National Notary Association”:

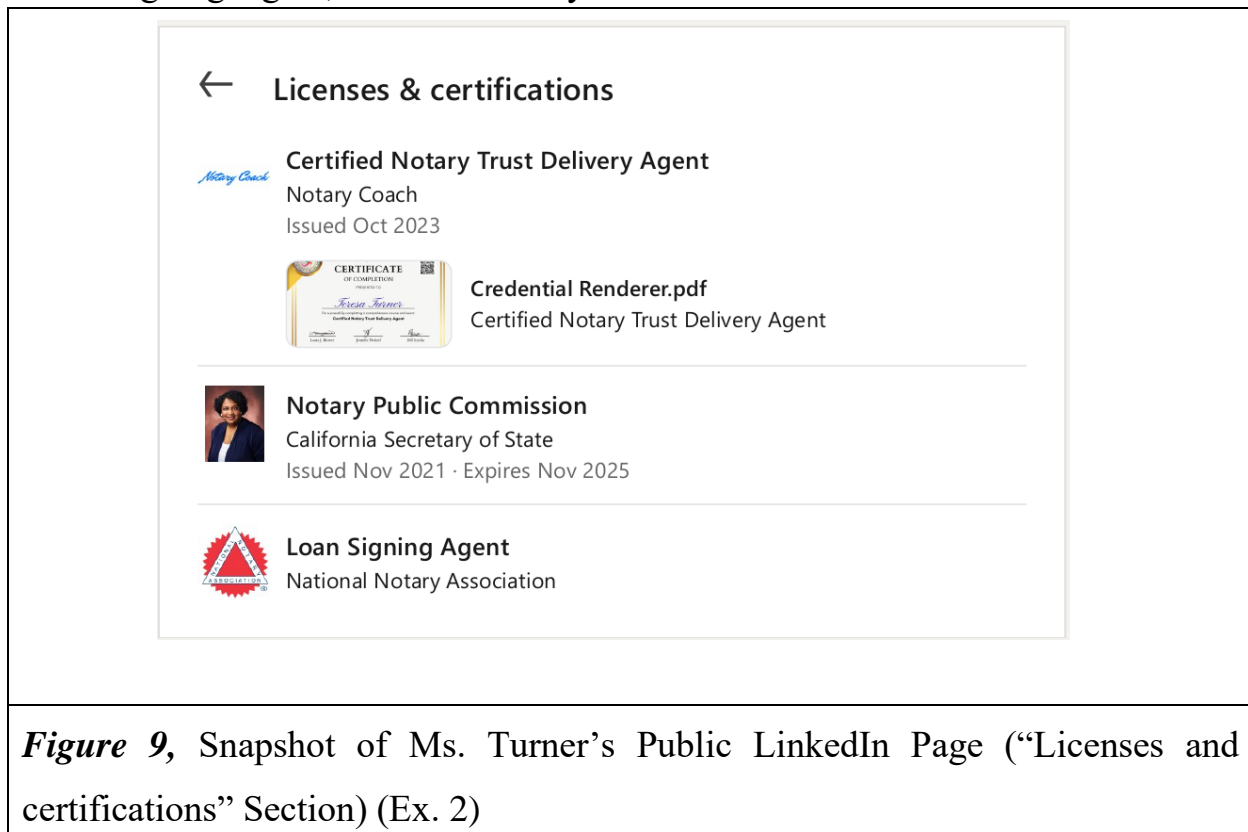


Figure 9, Snapshot of Ms. Turner’s Public LinkedIn Page (“Licenses and certifications” Section) (Ex. 2)

38. As shown above, Ms. Turner's profile includes a picture of the exact certificate she received from the NNA following the completion of the online NSA Certification program that she obtained from the NNA.

39. My investigation also revealed Ms. Turner's Facebook Profile. A true and accurate copy of her profile as of March 5, 2025 is attached as **Exhibit 3**.

40. On her Facebook profile, she identifies herself as a "Loan Signing Agent." Ex. 5 at 1. As explained above, this is the exact certification from the only program that she purchased from the NNA (the NSA Certification). Ms. Turner's Facebook profile also links to the website www.lady-and-the-stamp.com, which she identifies as her business. *Id.*

41. A true and accurate copy of Ms. Turner's business website located at, www.lady-and-the-stamp.com is attached as **Exhibit 4**.

42. On her website, Ms. Turner once again identifies herself as a "certified loan signing agent." Again, this is the exact certification from the only program that she purchased from the NNA (the NSA Certification):

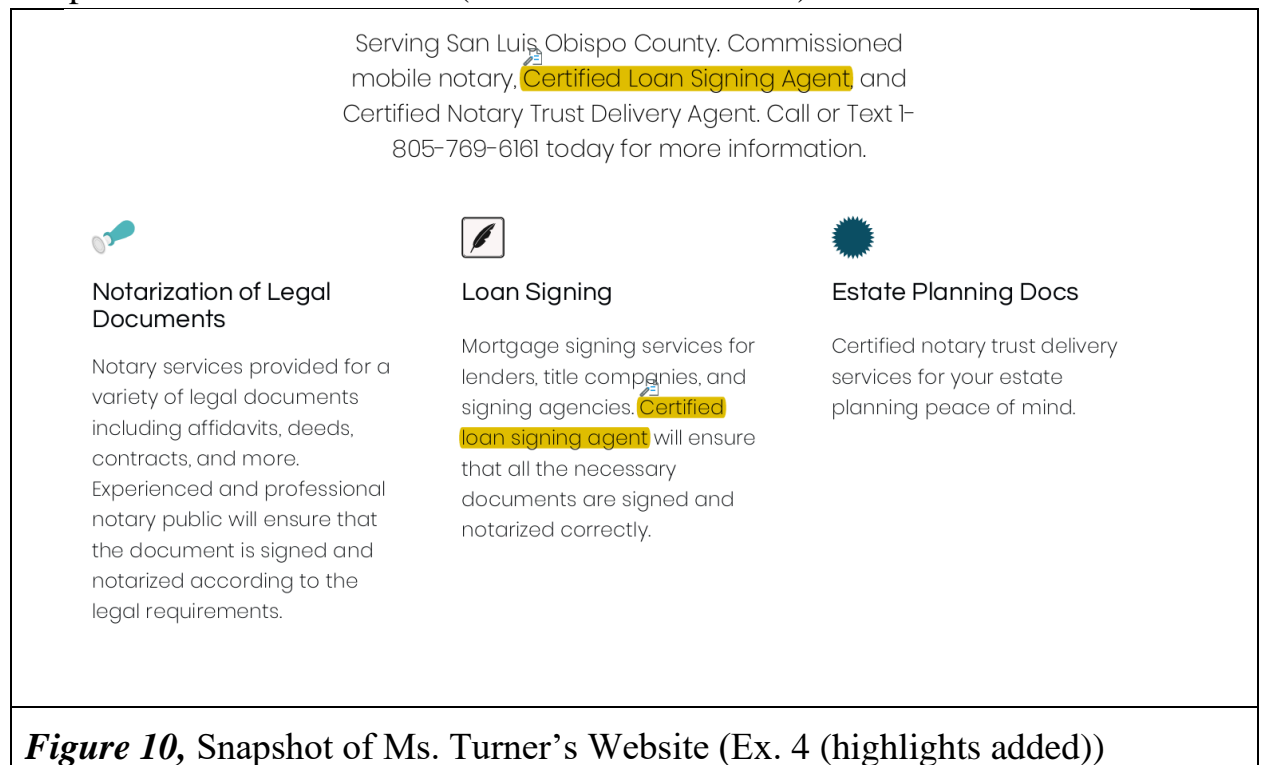


Figure 10, Snapshot of Ms. Turner's Website (Ex. 4 (highlights added))

43. In closing, the NNA seeks to serve its notary members by supporting

1 their needs, including offering education and training programs. Lawsuits like Ms.
2 Turner's jeopardize the NNA's ability to fulfill this important role.

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5 Executed on: March 7, 2025

6 By: /s/ Robert Clarke
7 Robert Clarke
8 Chief Financial Officer / VP Finance
9 National Notary Association
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Exhibit 1



Home



My Network



Jobs



Messaging



Notifications



Me




For Business

[Get hired faster](#)
[Premium free](#)**Teresa Turner** · 3rd

Mobile Notary, Loan Signing Agent, and Certified Notary Trust Delivery Agent (CNTDA)



- Lady and the Stamp

- Santa Barbara City College

Atascadero, California, United States · [Contact info](#)

371 connections

[Message](#)[Follow](#)[More](#)**About**

Notary Public and Loan Signing Agent.

Services

Notary

[Request services](#)[Show all services →](#)**Featured**

Link

**Web content for Tulsa kitchen and bath.**tulsakitchenandbath.com

Remodeling a kitchen or bathroom in Tulsa OK, on your own can be expensive and time-consuming. Instead, contact us for your kitchen or bathroom remodel in Tulsa.

Link

**How to Have Safe Property Inspections During a Pandemic ...**

ApplyConnect

During a pandemic, we have to take precautions with property inspections. While tenants still need to move during these times, it's business as usual.

Docur

N
fGSBF
3.0-pThis I
used
broke
team

Activity

372 followers

Posts

Comments

Events



Teresa Turner • 3rd+
Mobile Notary, Loan Signing Agent, and ...
1w •

Please come and support my ribbon cutting. Thank you.



Thu, Jan 23, 4:30 PM - 5:30 PM PST

[View event](#)

Ribbon Cutting

Atascadero, US



[Show all posts →](#)



Teresa Turner
Mobile Notary, Lo
1yr •

I'm happy to share that I've
certification: Certified Not
(CNTDA) from [Notary Co](#)



Celebrating a

2 · 3 comments

Experience



Lady and the Stamp

3 yrs 3 mos

Atascadero, California, United States

- **Notary Public and Loan Signing Agent**

Self-employed

Nov 2021 - Present · 3 yrs 3 mos

On-site

Notary Public and Loan Signing Agent.

Real Estate Transactions

- **Owner**

Self-employed

Nov 2021 - Present · 3 yrs 3 mos

Hybrid

Notary, Signing Agent and +1 skill

- **Business Owner**

Nov 2021 - Present · 3 yrs 3 mos



Freelance Writer

Teresa Turner · Freelance

Jan 1990 - Nov 2021 · 31 yrs 11 mos

Atascadero, CA

Various writing assignments. Web content, press releases, journalism, indexing, and creative writing for local publications. A few samples are...





Writer at Teresa Turner

Teresa Turner · Freelance

Jan 1988 - Nov 2021 · 33 yrs 11 mos
Atascadero, CA

Technical Writer for the Multiple Listing Service (MLS) user's guide. Writer for the Broker & Agent magazine and the South Bay (LA) Associa ...see more



GSBRLS Matrix Training Manual 3.0



Real Estate Agent, Community Association Manager

Independent Contractor

Mar 2003 - Feb 2015 · 12 yrs
Paso Robles, CA

Managed a portfolio of eight community associations. Budgeting, vendor bidding, and insurance administration. Assisted homeowners and...



Executive Assistant (part time)

Haight Properties

Sep 2009 - Sep 2011 · 2 yrs 1 mo
Santa Barbara, CA

Maintain multi-family property insurance and reports. Assist in foreclosures, law suits, refinance and acquisitions for a General Partner of Investors....

Show all 9 experiences →

Education



Santa Barbara City College

Some College - Computer Science and Theater
1983 - 1985

Licenses & certifications



Certified Notary Trust Delivery Agent

Notary Coach
Issued Oct 2023



Credential Renderer.pdf

Certified Notary Trust Delivery Agent



Notary Public Commission

California Secretary of State
Issued Nov 2021 · Expires Nov 2025

Show all 3 licenses & certifications →

Volunteering



Real Estate and CrowdFunding

Paso Robles Food Co-op
Apr 2013 - Mar 2019 · 6 yrs
Education

One of the original founders, I have been involved with the steering committee and the marketing, outreach, and business sub-committees. Als...



Board of Directors, Local Director

Paso Robles Association of Realtors
Jan 2013 - Dec 2014 · 2 yrs

Skills

Notary

 Owner at Lady and the Stamp

Signing Agent

 Owner at Lady and the Stamp

Show all 29 skills →

Recommendations

Received Given

Nothing to see for now
Recommendations that Teresa receives will appear here.

Courses

Certificates for Professional Technical Writing Technical

 Associated with Dynamic Systems Inc.*

Certificates of Completion of Multiple Listing Service (MLS) Training


 Associated with Independent Contractor

Show all 5 courses →

Honors & awards

Member of the Year

Issued by South Bay (LA) Association of Realtors · Oct 2005

 Associated with Independent Contractor

Outstanding Service and Dedication Award

Issued by South Bay (LA) Association of Realtors · Oct 2005

 Associated with Independent Contractor

For my duties at the South Bay (LA) Association of Realtors:
Multiple Listing Service (MLS) trainer....

Show all 3 honors & awards →

Interests

Companies Groups

 American Bar Association
289,431 followers

+ Follow

 National Notary Association
61,960 followers

+ Follow

Show all companies →

Exhibit 2



Home



My Network



Jobs



Messaging



Notifications



Me



For Business



Retry Premium for \$0

**Teresa Turner**

Mobile Notary, Loan Signing Agent, and Certifi...

More

+ Follow

Message



Licenses & certifications



Certified Notary Trust Delivery Agent

Notary Coach

Issued Oct 2023



Credential Renderer.pdf

Certified Notary Trust Delivery Agent



Notary Public Commission

California Secretary of State

Issued Nov 2021 · Expires Nov 2025



Loan Signing Agent

National Notary Association



gWorks

Chirag H., explore relevant opportunities
with gWorks

Get the latest jobs and industry news

Follow

More profiles for you

ID #:105

Promoted ***

**Thousands Trust Actalent**

Thousands trust Actalent's engineering and science services.



Orhan & 3 other connections also follow Actalent

**Study Digital Forensics**

Enhance Your Career w/a Digital Forensics Grad Certificate.
Online/OnCampus

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Visit our Help Center.

**Manage your account and privacy**

Go to your Settings.

**Recommendation transparency**

Learn more about Recommended Content.

[Select Language](#)[English \(English\)](#) ▼

LinkedIn Corporation © 2025

Exhibit 3



2



Teresa Turner

856 friends



Add friend



Message



Posts

About

Friends

Photos

Videos

Reels

More ▼



Intro

Notary Public, Loan Signing Agent, and Certified Notary Trust Delivery Agent



Notary Public • Loan Signing Agent at Lady & the Stamp



Studied Computer science and theater. at **Santa Barbara City College**



Lives in **Atascadero, California**



Single



Joined on June 2009



Followed by **487 people**

Exhibit 4

[About](#)[Teresa Turner](#)
[Contact](#) [Blog](#)
Mobile Notary

Lady & the Stamp Mobile Notary

[Call Now](#)[Get a Quote](#)

Professional Mobile Notary Services in San Luis Obispo County

Lady and the Stamp is a commissioned mobile notary, certified loan signing agent, and certified notary trust delivery agent serving San Luis Obispo County. I provide convenient, reliable, and affordable mobile notary services at your doorstep. Call or text 1-805-769-6161 today for more information.

[Read More](#)

Serving San Luis Obispo County. Commissioned mobile notary, Certified Loan Signing Agent, and Certified Notary Trust Delivery Agent. Call or Text 1-805-769-6161 today for more information.



Notarization of Legal Documents

Notary services provided for a variety of legal documents including affidavits, deeds, contracts, and more. Experienced and professional notary public will ensure that the document is signed and notarized according to the legal requirements.



Loan Signing

Mortgage signing services for lenders, title companies, and signing agencies. Certified loan signing agent will ensure that all the necessary documents are signed and notarized correctly.



Estate Planning Docs

Certified notary trust delivery services for your estate planning peace of mind.



Signature Witnessing

We offer notary services for power of attorney documents. Our notary public will ensure that the document is signed and notarized according to the legal requirements.



We provide notary services for health care directives. Our notary public will ensure that the document is signed and notarized according to the legal requirements.



Notarial Acknowledgement

We offer other mobile notary services including vehicle title transfers, jail notary services, and more. Contact us to discuss your specific needs.

[See More](#)